

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANTHONY ZARA,

Plaintiff,

v.

DEVRY EDUCATION GROUP, INC.;
DEVRY MEDICAL INTERNATIONAL,
INC.; ROSS UNIVERSITY SCHOOL OF
MEDICINE, SCHOOL OF VETERINARY
MEDICINE (ST. KITTS) LIMITED; and
ALEXA FERRARI

Defendants.

Case No. 1:16-cv-05156

Honorable Judge Andrea R. Wood
Magistrate Judge Sidney Schenkier

**MOTION TO DISMISS PLAINTIFF’S CLAIMS AGAINST DEFENDANTS
DEVRY EDUCATION GROUP INC., DEVRY MEDICAL INTERNATIONAL, INC.,
AND ROSS UNIVERSITY SCHOOL OF MEDICINE, SCHOOL OF VETERINARY
MEDICINE (ST. KITTS) LIMITED**

Defendants DeVry Education Group Inc. (DVG), DeVry Medical International, Inc. (DMI) and Ross University School of Medicine, School of Veterinary Medicine (St. Kitts) Limited (RUSVM) (collectively, “Defendants”), respectfully move this Court to dismiss Plaintiff’s Second Amended Complaint.

Defendant RUSVM moves to dismiss all four claims made against the school in Plaintiff’s Second Amended Complaint, pursuant to Federal Rule of Civil Procedure 12(b)(2) for lack of personal jurisdiction. In the alternative, RUSVM moves to dismiss Plaintiff’s Title IX claim pursuant to Rule 12(b)(6) for failure to state a claim and all the remaining claims against it on *forum non conveniens* grounds. Defendants DVG and DMI move to dismiss the single claim brought against them pursuant to Rule 12(b)(6) for failure to state a claim or, in the alternative, on *forum non conveniens* grounds.

In support of this Motion, Defendants incorporate by reference the reasons set forth in its Memorandum in Support of the Motion to Dismiss Plaintiff's Claims Against Defendants DeVry Education Group Inc., DeVry Medical International, Inc., and Ross University School of Medicine, School of Veterinary Medicine (St. Kitts) Limited, which is filed contemporaneously with this Motion.

WHEREFORE, Defendants DeVry Education Group Inc., DeVry Medical International, Inc., and Ross University School of Medicine, School of Veterinary Medicine (St. Kitts) Limited respectfully request that this Court dismiss all claims against them and grant any further relief the Court deems just.

DATED: June 8, 2016

Respectfully submitted,

DEVRY EDUCATION GROUP INC.,
DEVRY MEDICAL INTERNATIONAL,
INC., and ROSS UNIVERSITY SCHOOL OF
MEDICINE, SCHOOL OF VETERINARY
MEDICINE (ST. KITTS) LIMITED.

By s/ Katherine F. Mendez

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CERTIFICATE OF SERVICE

I do hereby certify that on June 8, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court by using the Court's CM/ECF System, which will send electronic notification of such filing to the following:

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s/ Katherine F. Mendez
Katherine F. Mendez